UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK	
ROBERT BARTLETT, et al.,	x :
Plain	tiffs, : No. 1:19-cv-00007-CBA-TAM
– against –	: :
SOCIÉTÉ GÉNÉRALE DE BANQUE AU LI SAL, et al,	BAN :
Defend	ants.
	X

# JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO LETTER ROGATORY

**WHEREAS**, on June 8, 2023, this Court issued an order providing, *inter alia*, that the deadline for Lebanese authorities to respond to any Letters Rogatory would be "eight (8) months from the date the Court issues the Letters Rogatory";

**WHEREAS**, on August 14, 2023, this Court issued a Request for International Judicial Assistance (Letter Rogatory), and so the deadline for the Lebanese authorities to respond is Monday, April 15, 2024;

WHEREAS, on April 3, 2024, the Moving Defendants provided this Court and Plaintiffs with a copy of a letter from Lebanon's Minister of Justice, Judge Henri Khoury, dated March 28, 2024, which explains that the Letter Rogatory requesting international judicial assistance did not reach the Lebanese Ministry of Justice until February 2, 2024, and requests that the deadline to respond to the Letter Rogatory be extended by three months, given the "Ministry's heavy schedule under the prevailing circumstances in the region and the country and the necessity of engaging with various government agencies in this process";

WHEREAS, on April 5, 2024, Plaintiffs advised the Court that they do not object to the Lebanese Ministry of Justice's request to extend the Lebanese authorities' deadline to Monday, July 15, 2024;

**NOW THEREFORE**, it is stipulated and agreed between the parties hereto and their undersigned counsel that the deadline for Lebanese authorities to respond to the Letter Rogatory is extended by three months to Monday, July 15, 2024.

Dated: April 11, 2024

**OSEN LLC** 

By: /s/ Ari Ungar

Ari Ungar Michael Radine Aaron Schlanger Dina Gielchinsky 190 Moore Street, Suite 272

Hackensack, NJ 07601

201-265-6400

Email: aungar@osenlaw.com
Email: mradine@osenlaw.com
Email: aschlanger@osenlaw.com
Email: dgielchinsky@osenlaw.com

Attorneys for Plaintiffs

Respectfully submitted,

DLA PIPER LLP (US)

By: /s/ *Anthony P. Coles* 

Anthony P. Coles Erin Collins

1251 Avenue of The Americas

New York, NY 10020

212-335-4925

Email: anthony.coles@dlapiper.com Email: erin.collins@dlapiper.com

Samantha L. Chaifetz 500 8th Street, NW Washington, DC 20004

202-799-4082

Email: samantha.chaifetz@dlapiper.com

Attorneys for Defendants Byblos Bank SAL, Bank of Beirut and the Arab Countries SAL, and Bank of Beirut s.a.l.

#### MAYER BROWN LLP

By: /s/ Andrew J. Pincus

Andrew J. Pincus

Marc R. Cohen

Alex C. Lakatos

Wajdi C. Mallat

1999 K Street, NW

Washington, DC 20006

202-263-3220

Email: apincus@mayerbrown.com Email: mcohen@mayerbrown.com Email: alakatos@mayerbrown.com Email: wmallat@mayerbrown.com

Attorneys for Defendant Bank Audi SAL

### MAYER BROWN LLP

By: /s/ Mark G. Hanchet

Mark G. Hanchet

Robert W. Hamburg

Benjamin D. Bright

Whitney A. Suflas

1221 Avenue of the Americas

New York, NY 10020

Email: mhanchet@mayerbrown.com Email: rhamburg@mayerbrown.com Email: bbright@mayerbrown.com Email: wsuflas@mayerbrown.com

Attorneys for Defendant Banque Libano-Française SAL

#### DECHERT LLP

By: /s/ Jonathan R. Streeter
Jonathan R. Streeter
Tamer Mallat
1095 Avenue of the Americas
Three Bryant Park
New York, NY 10036
212-698-3500

Email: jonathan.streeter@dechert.com Email: tamer.mallat@dechert.com

Michael H. McGinley Cira Centre 2929 Arch Street Philadelphia, PA 19104 215-994-4000 Email: michael.mcginley@dechert.com

Attorneys for Defendants BLOM Bank SAL and Fransabank SAL

## SQUIRE PATTON BOGGS (US) LLP

By: /s/ Gassan A. Baloul
Gassan A. Baloul
Mitchell R. Berger
2550 M Street, NW
Washington, DC 20037
202-457-6155

Email: gassan.baloul@squirepb.com Email: mitchell.berger@squirepb.com

Attorneys for Defendants MEAB Bank s.a.l., Fenicia Bank S.A.L., and LGB Bank s.a.l.

# ASHCROFT LAW FIRM, LLC

By: Michael J. Sullivan
Michael J. Sullivan
Brian J. Leske
200 State Street, 7th Floor
Boston, MA 02109
617-573-9400

Email: msullivan@ashcroftlawfirm.com Email: bleske@ashcroftlawfirm.com

Attorneys for Defendant Société Générale de Banque au Liban S.A.L.

So ordered this day of	, 2024
Hon. Taryn A. Merkl	
United States Magistrate Judge	